

WILLIAM W. McGAHA, ESQ.

Nevada Bar #3234

SCHUETZE, McGAHA, TURNER & FERRIS PLLC.

601 S. Rancho Drive, Suite C-20

Las Vegas, Nevada 89106

(702) 369-3225

(702) 369-2110 Fax

bmcgaha@smlvlaw.net

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BRANDON ROCHE,

Plaintiff,

vs.

DIEGO GUZMAN, and TSG FLEET
SERVICES, LLC, a California Limited
Liability Company; DOES I – X, and ROE
CORPORATIONS XI – XX, inclusive,

Defendants.

CASE NO: 2:23-cv-00488-CDS-EJY

**STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by and between the parties through their undersigned counsel of record, WILLIAM W. McGAHA, ESQ., of SCHUETZE, McGAHA, TURNER & FERRIS, PLLC, counsel for Plaintiff, and TREVOR R. WAITE, ESQ., of FABIAN VANCOTT, counsel for Defendants, as follows:

The parties stipulated and respectfully request that this Honorable Court extend the discovery deadlines, and all deadlines arising therefrom, found in their Discovery Plan and Scheduling Order, originally filed July 17, 2023, in this matter as set forth below:

A. Discovery Cut-Off:

a. Current Deadline: March 26, 2024

b. New Deadline: April 26, 2024

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B. Initial Expert Disclosures & Reports:

- a. Current Deadline: January 26, 2024
- b. New Deadline: February 26, 2024

C. Rebuttal Expert Disclosures & Reports:

- a. Current Deadline: February 26, 2024
- b. New Deadline: March 26, 2024

D. Motion to Amend Pleadings & Add Parties:

- a. Current Deadline: December 27, 2023
- b. New Deadline: January 26, 2024

E. Interim Status Report:

- a. Current Deadline: March 16, 2023
- b. New Deadline: June 16, 2023

F. Dispositive Motions:

- a. Current Deadline: April 25, 2024
- b. New Deadline: May ²⁷~~25~~, 2024

G. Pre-Trial Order:

- a. Current Deadline: May 27, 2024
- b. New Deadline: June 27, 2024

The parties to this action are not making this request for the purpose of unduly delaying the trial in this matter. The parties are diligently working together to complete discovery and the additional time will help provide time for meaningful ADR as there are complicated insurance and unusual insurance coverage issues. Additionally, Plaintiff BRANDON ROCHE is claiming extensive injuries arising from the subject collision, requiring reports from multiple medical experts, as well as depositions of both parties and said experts. Defendants are located in California.

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To date, parties have served written discovery and disclosures. The Defendant has responded to written discovery and Plaintiff is drafting response to written discovery.

Defendant Diego Guzman was deposed on September 21, 2023. Plaintiff's deposition needs to be taken as well as the Person Most Knowledgeable for Defendant TSG Fleet Services, LLC.

After all depositions have been completed and the transcripts and/or reports received, additional discovery may be pursued to explore and/or clarify any issues that arose during the same.

Therefore, the parties require additional time to complete the full extent of discovery. They therefore stipulate to extend the discovery deadlines, and all deadlines arising therefrom, as set forth above.

DATED this 19th day of October 2023.

**SCHUETZE, McGAHA TURNER
& FERRIS, PLLC**

By /s/William W. McGaha
WILLIAM W. McGAHA, ESQ.
Nevada Bar #3234
601 S. Rancho Drive, Suite C-20
Las Vegas, Nevada 89106
Attorneys for Plaintiff

DATED this 19th day of October 2023.

FABIAN VANCOTT

By /s/Trevor R. Waite
TREVOR R. WAITE, ESQ.
411 E. Bonneville Avenue, Suite 400
Las Vegas, Nevada 89101
Attorneys for Defendants

Roche v. Guzman, et al
CASE NO: 2:23-cv-00488-CDS-EJY
Stipulation & Order to Extend Discovery

ORDER

IT IS SO ORDERED this 19th day of October 2023.


UNITED STATES MAGISTRATE JUDGE